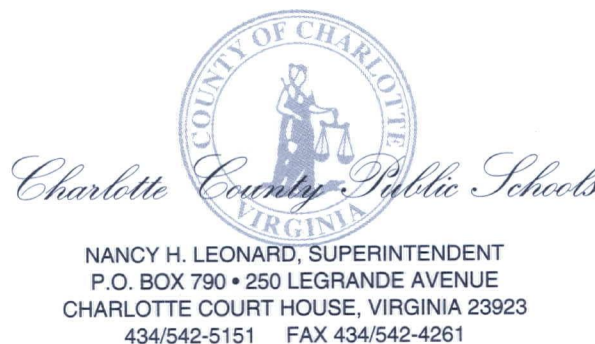


LARRY W. FANNON  
County Seat  
BILL DEVIN  
Red Oak / Wylliesburg  
GLORIA TALBOTT  
Drakes Branch  
R. B. "JAY" GEORGE  
Keysville



HENRY W. CARWILE, JR.  
Cullen / Red House  
KENNY REDMOND  
Aspen / Phenix  
JON BERKLEY  
Bacon / Saxe  
DANA L. RAMSEY  
Clerk of Board

June 29, 2016

Becky L. France  
Water Permit Writer  
Department of Environmental Quality  
3019 Peters Creek Road  
Roanoke, Virginia 24019

Dear Ms. France:

RE: Bacon District Elementary School STP  
NPDES Permit# VA0029319  
Permit Reissuance PCB Waiver Request

This letter is requesting a waiver for the PCB monitoring requirements for the reissued permit of the facility referenced above. The waiver request is submitted in accordance with the Virginia Department of Environmental Quality (DEQ) *TMDL Guidance Memo GM09-2001 Guidance for monitoring of point sources for TMDL development using low-level PCB method 1668* which stipulates that exemptions from PCB monitoring may include minor municipal facilities provided that:

*The permittee shall provide adequate documentation that the facility is not a potential source of PCBs. This is based on a certified report by the owner and may include site inspection by DEQ staff.*

This request provides the facility background and other information supporting our belief that this wastewater treatment plant does not represent a source of PCBs beyond background levels and should not be required to conduct PCB Monitoring.

The Bacon Elementary School was constructed in 1958. The waste treatment plant has a current design flow rate of 6,000 gallons per day (gpd). Current flows average around 2,500 gpd. No chemicals now or in the past have been stored on site. No PCB containing chemicals now or in the past have been stored on site. The WWTP facilities and operations are not expected to contain or generate PCBs beyond background levels.

The collection system serves only the school building and no commercial establishments are served by the system. The service area does not now or in the past include areas influenced by industry or manufacturing facilities that could have used or released PCBs to the surrounding environment. The school building existing fluorescent light ballast, used during original construction, is suspect of containing PCBs. They are replaced with electronic ballast as they go bad and are removed from the facility, handled and disposed of as a hazardous waste. The collection system is not expected to have been impacted by historic PCB uses or by a source of PCBs.

June 29, 2016

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In recognition of the fact that the wastewater treatment plant, the wastewater collection system, and the wastewater sources served by this facility have no reasonable expectation to contain PCBs at concentrations greater than background levels, I request that the requirement to conduct low-level PCB monitoring be waived for this facility.

Please feel free to contact me at (434) 542-4259 if you have any questions or need additional information.

***Certification:*** *I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,

A handwritten signature in black ink, appearing to read "Larry D. Roller". The signature is fluid and cursive, with the first name "Larry" being more prominent than the last name "Roller".

Larry D. Roller  
Director of Facilities and Operations

LR/